

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CANON, INC.,

Plaintiff,

vs.

TCL ELECTRONICS HOLDINGS LTD.,
TCL CORPORATION,
SHENZHEN TCL NEW TECHNOLOGIES CO.
LTD.,
TCL KING ELECTRICAL APPLIANCES
(HUIZHOU) CO., LTD.,
TCL KING ELECTRONICS (CHENGDU)
CO., LTD.,
TCL KING ELECTRICAL APPLIANCES
(NANCHANG) CO., LTD.,
TCL TONGLI ELECTRONICS (HUIZHOU)
CO., LTD., and
TONLY ELECTRONICS HOLDINGS LTD.

Defendants.

No. 2:18-cv-00546

Jury Trial Demanded

**DECLARATION OF JIN YANG IN SUPPORT OF DEFENDANTS'
MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, **Jin Yang**, declare as follows:

1. I serve as General Counsel of TCL Corporation ("TCL Corp.").
2. I submit this declaration in support of Defendants' Motion to Transfer Venue to the Northern District of California.
3. I am knowledgeable about the facts within this declaration based on personal knowledge and investigation.
4. I understand that Canon, Inc. ("Canon") has sued TCL Corp. and others for alleged patent infringement of five patents: U.S. Patent Nos. 7,746,413, 7,810,130, 8,078,767, 8,346,986, and 8,713,206. I understand that Canon asserts that Defendants infringe with "television systems that integrate the Roku operation system" (the "Accused Products").
5. TCL Corp. has no directors, officers, or employees that reside or work in the United States. To the best of my knowledge based on investigation, TCL Corp. does not keep any documents in the United States.
6. TCL Corp. is not involved in the manufacture or distribution of the Accused Products. TCL Corp. also does not offer, and has not offered for sale, the Accused Products. Accordingly, it is my belief that TCL Corp. (a) does not employ persons with knowledge relevant to this suit, and (b) does not have documents relevant to this suit. To the extent any TCL Corp. employee has information relevant to this suit, they would be located in China. To the extent TCL Corp. has any documents relevant to this suit, they would be located in China, at TCL Corp.'s headquarters.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 5, 2019.

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/s/

Jin Yang